

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

SCOTT K. RISLEY,	:	CIVIL ACTION
Plaintiff	:	
	:	
v.	:	NO.
	:	
FINANCIAL AID MANAGEMENT FOR EDUCATION,	:	
and COAST PROFESSIONAL, INC., and DOES I-X	:	
Defendants	:	JURY TRIAL DEMANDED

NOTICE OF REMOVAL

Coast Professional, Inc. (“Coast”), by its undersigned counsel, and with the consent of defendant Financial Aid Management for Education, hereby petitions this Court as follows, pursuant to 28 U.S.C. § 1441(a):

1. Coast is a defendant in an action pending in the Arizona Superior Court, Yavapai County, Case No. V-1300-CV-201380107 (“the State Court Action”). A true and correct copy of the Complaint in the State Court Action is attached hereto as Exhibit “A”.

2. Plaintiff in the State Court Action is Scott K. Risley (“plaintiff”). See Exhibit “A”.

3. Plaintiff’s State Court Action alleges violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et seq.

4. The State Court Action involves a question of federal law. Pursuant to 28 U.S.C. § 1331, “The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.”

5. Pursuant to 28 U.S.C. § 1441(a), “[a]ny civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the

defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending.”

6. Since this case arises out of an alleged violation of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et seq., defendant Coast may properly remove the State Court Action to this Court based on 28 U.S.C. § 1441(a).

7. This Notice has been filed with the Court within thirty (30) days after purported service of the Complaint on defendant Coast.

WHEREFORE, defendant Coast prays that the State Court Action be removed from the Arizona Superior Court, Yavapai County, Case No. V-1300-CV-201380107, to this Court for proper and just determination.

JEROLD KAPLAN LAW OFFICE, P.C.

By: /S/ Pat Esquivel
Pat Esquivel
2738 E. Washington Street
Phoenix, AZ 85034
602-258-8433
Attorneys for Defendant Coast Professional, Inc.

Dated: April 12, 2013

CERTIFICATE OF SERVICE

I, PAT ESQUIVEL, hereby certify that on or about this date, I served a true and correct copy of the foregoing electronically, or by first class mail, postage prepaid, or telecopy on the following:

Scott K. Riley
P.O. Box 684
Rimrock, Arizona 86335
928-925-5972
scott.k.risley@gmail.com
Plaintiff Pro Se

/S/ Pat Esquivel

PAT ESQUIVEL, ESQUIRE

Dated: April 12, 2013